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**From:** Sarah Corbin [mailto:SCorbin@surfrider.org]  
**Sent:** Monday, December 10, 2007 12:15 PM  
**To:** Melissa Miller-Henson  
**Cc:** bobbreen; SurfriderSMCBoard@googlegroups.com  
**Subject:** North Coast MLPA RSG Comments re: Ribbon Proposal

Hi Melissa,

I am writing to you on behalf of The Surfrider Foundation and the four chapters located within the North Central Coast MLPA Study Region: San Mateo County, Marin County, Sonoma Coast, and Mendocino County Chapters. The Surfrider Foundation is a non-profit grassroots organization dedicated to the protection and enjoyment of our world's oceans, waves and beaches. Founded in 1984 by a handful of visionary surfers in Malibu, California, the Surfrider Foundation now maintains over 50,000 members and 80 chapters worldwide. Our members include recreators and people who support their livelihood in the coastal zone, including fishermen.

It has been brought to our attention by Bob Breen, one of the members of the RSG, that stakeholders representing recreational fishers have formally asked DF&G staff for an opinion on the feasibility of a "ribbon" proposal, which would allow hook and line fishing in any marine reserve from the shore line out to 100 yards. While Surfrider Foundation supports the creation of MPA arrays that support a range of uses, from a policy standpoint it seems that this goal is best achieved through designing arrays that make good use the various types of defined MPAs to provide the appropriate level of resource protection, as opposed to creating exceptions not supported by the MPA definitions. Since varied protection levels are inherent to the different types of MPAs by definition, it seems that these definitions should be adhered to and—if the proposed designation does not provide a suitable level of scientifically-supported protection—that changing either the designation or location of the MPA would be the most clear and effective way to achieve this end.

Further, from the resource protection standpoint, we also feel this "ribbon" proposal to be inappropriate. Any type of "ribbon" would be troubling at the enforcement level, as the changing tides create a dramatically varying waterline. At low tide, a "ribbon" area might be completely exposed above water, in which case those fishing might continue to fish beyond the "ribbon" zone. In regards to the integrity of the MPA—in this case SMRs—this integrity would be compromised by the allowance of even hook and line recreational fishing. There is a significant amount of bycatch or catch and release with shore fishers, especially with those species having a size limit.

These species include lingcod, cabezon, kelp and rock greenling, redbtail surfperch, and leopard shark. The accepted mortality for catch and release is 6 - 7% per year. This may seem small, however since these fishes are long lived, 6 - 7% mortality is compounded year after year and can dramatically affect these populations.

For the reasons enumerated above, Surfrider Foundation does not support the "ribbon" exception in designated SMRs.

Sincerely,  
Sarah Corbin  
Central California Regional Manager  
Surfrider Foundation

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